

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KAREEM RAY SENISES,	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
KAREEM RAY SENISES,	:	
Respondent	:	CASE NO. 1-23-bk-00736-HWV

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 11<sup>th</sup> day of December, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. The Trustee avers that the Debtor's Plan is not feasible based upon the following:
  - a. The Plan is ambiguous regarding the payment and base amount. More specifically, the total to pay to Amerisave in Section 2.D. should be \$72,613.54, not \$92,204.32, and the total base amount should be \$114,636.06, not \$110,622.46.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 11<sup>th</sup> day of December, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Leonard Zagurskie, Jr., Esquire  
110 West Main Avenue  
1<sup>st</sup> Floor  
Myerstown, PA 17067

/s/Derek M. Stroupauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee